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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Northern Alaska)	
Environmental Center, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	
David Bernhardt, in his official)	Case No. 3:20-cv-00187-SLG
capacity as Secretary of the Interior,)	
<i>et al.</i> ,)	
)	
Defendants,)	
)	
and)	
Ambler Metals LLC and Alaska)	
Industrial Development and Export)	
Authority,)	State of Alaska's Motion to Intervene
)	
Intervenor-Defendants.)	
)	

Pursuant to FRCP 24(a)(2), proposed intervenor State of Alaska (“State” or “Alaska”) hereby moves this Court for an Order granting Alaska leave to intervene in the instant dispute as a matter of right. Alternatively, and pursuant to FRCP 24(b), Alaska hereby moves this Court for entry of an Order granting Alaska permissive leave to intervene in the instant dispute.

Counsel for the State of Alaska contacted counsel for all existing parties, including Plaintiffs, Defendants, and Intervenor-Defendants regarding this request for intervention. Counsel for Plaintiffs reserved their position and anticipated a written response to the State’s motion. Counsel for the federal Defendants take no position on the State’s motion. Counsel for AIDEA and Ambler Metals, LLC both support the State’s motion.

DATED: December 16, 2020.

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By: /s/ J. Anne Nelson
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CERTIFICATE OF SERVICE

I hereby certify on **December 16, 2020**, I caused to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification and electronic service of the same to all counsel of record.

/s/ Leilani J. Tufaga
Law Office Assistant II